

ORIGINAL

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF WYOMING

DISTRICT OF WYOMING

2014 FEB 3 PM 12:00

UNITED STATES OF AMERICA

STEPHAN HARRIS, CLERK
CHEYENNE

CRIMINAL COMPLAINT

v.

STEFANI COLLEEN RULAND

CASE NUMBER: 14-MJ-08-S

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT ONE

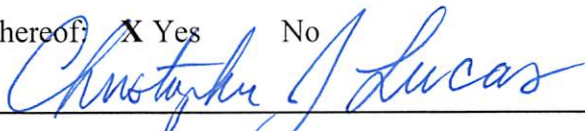
Between on or about December 28, 2013, through and including January 27, 2014, in the District of Wyoming, the Defendant, **STEFANI COLLEEN RULAND**, did knowingly steal and take mail, namely, mail containing personal and business checks which had been placed in an authorized depository for mail matter, to wit, the United States Post Office in Buffalo, Wyoming.

In violation of 18 U.S.C. §1708 (1st Paragraph).

I further state that I am a Special Agent and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT OF
United States Postal Inspector Christopher J. Lucas**

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant
Christopher J. Lucas

Sworn to before me and subscribed in my presence,

February 3, 2014

at

Cheyenne, Wyoming

Date

Hon. Kelly H. Rankin
Chief Magistrate Judge

Name & Title of Judicial Officer

City and State



Signature of Judicial Officer

COUNT TWO

Between or about January 6, 2014, through and including January 30, 2014, in the District of Wyoming, the Defendant, **STEFANI COLLEEN RULAND**, did knowingly possess and use, in and affecting interstate commerce and without lawful authority, a means of identification of another person, to wit, R L. K., with the intent to commit unlawful activities constituting a violation of state law, to wit, forgery in violation of Wyoming Statute 6-3-602(a)(ii), and by such conduct the Defendant obtained items of value aggregating \$1,000 or more during a one-year period.

In violation of 18 U.S.C. §§ 1028(a)(7) and (b)(1)(D).

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
U.S. POSTAL INSPECTOR CHRISTOPHER LUCAS
U.S. v. STEFANI COLLEEN RULAND

I, Christopher J. Lucas, being duly sworn on oath, swear and affirm as follows:

1. I am a U.S. Postal Inspector of the United States Postal Inspection Service (USPIS), and I have been so employed for over eight years.

2. This affidavit is made in support of a complaint and an application for an arrest warrant for violations of Title 18 U.S.C. §1708 and 18 U.S.C. § 1028(a)(1).

3. The information contained within this Affidavit is based on my personal observations, my training and on information related to me by other law enforcement officers and investigators as set forth more fully herein.

4. On January 23, 2014, your Affiant was telephonically contacted by Deputy Paul Kozisek, Johnson County Sheriff's Office (JCSO), Buffalo, Wyoming regarding mail containing personal and business checks that had been stolen from the US Post Office in Buffalo, Wyoming. Deputy Kozisek advised that checks that had been written and mailed were being used at Walmart Stores in Gillette, Sheridan and Cody, Wyoming by an unknown white female later identified as **STEFANI COLLEEN RULAND (RULAND)**. Deputy Kozisek stated he had spoken with four victims who all stated the checks were mailed from either the blue collection box outside the Buffalo Post Office or from the outgoing mail slot inside the Post Office in Buffalo, Wyoming.

5. Deputy Kozisek stated that on January 23, 2014, V. H. reported that check #2583, dated January 15, 2014, was made payable to United Weavers of America in Georgia in the amount of \$70.95. V. H. stated the check was used at the Walmart in Gillette, Wyoming, and cleared his

bank, First Northern Bank on January 21, 2014 in the amount of \$1,664.57. V. H. stated he did not write the check to Walmart. On January 15, 2014, he made check #2576 payable to Snow Services in the amount of \$140.00. This check was used at Walmart in Sheridan, Wyoming, and cleared his bank on January 22, 2014 in the amount of \$1,454.81. V. H. told Deputy Kozisek that both checks were mailed on January 15, 2014 from the outside collection box at the Buffalo, Wyoming Post Office.

6. On January 24, 2014, Deputy Kozisek contacted Assistant Manager Aaron Willy at the Walmart store in Sheridan, Wyoming, in an attempt to locate the transaction involving Harrell's check. Willy provided surveillance video of a white female (**RULAND**) making the purchase and receiving a receipt for the transaction. The transaction receipt included a purchase total of \$1454.81 and a Wyoming Driver's License # ending in 2220 that was used by **RULAND** while making the purchase. The Driver License number belongs to R. L. K. from Banner, Wyoming, and not **RULAND**.

7. On January 24, 2014, Deputy John Gale, Sheridan County Sheriff's Office (SCSO) contacted R. L. K. at the request of Deputy Kozisek, R. L. K. was not the female observed in the surveillance video from the Sheridan, Walmart. R. L. K. stated she had mailed a personal check and a form to Vital Statistics to obtain a copy of her birth certificate. The form contained all of her personal information. R. L. K. told Deputy Gale she had not received the copy of her birth certificate and later notified Deputy Gale that the check she sent to Vital Statistics was used by an unknown person at a retail store. R. L. K. is attempting to get all of her banking information together for law

enforcement. R. L. K. told Deputy Gale she did not give anyone permission to use her identification or any of her personal checks.

8. On January 24, 2014, United States Postal Service (USPS) Customer Service Supervisor Kurt Downing contacted your Affiant by telephone and stated three glue traps used for catching mice and roaches had been found in the outside collection boxes at the Casper, Wyoming main Post Office located at 411 Forrest Drive, Casper, Wyoming. Downing stated the glue traps had a four or five foot piece of purple cord attached to the trap with black tape. Downing said the glue traps had been found stuck to the inside of the collection boxes.

9. On January 25, 2014, at approximately 7:30 am, USPS Postmaster Douglas Lykins contacted your Affiant by telephone and stated he had located a sticky glue trap with a purple cord attached to it in his outgoing mail slot of the lobby of the Evansville Post Office in Evansville, Wyoming.

10. On January 28, 2014, Deputy Kozisek contacted your Affiant regarding additional victims and information that **RULAND** had been observed in the Walmart store in Cody, Wyoming. Deputy Kozisek stated he had contacted Cody, Wyoming Walmart Manager John Dixon (Dixon) by telephone to determine if they had also had a similar pattern of conduct and Dixon reported that fraudulent and forged checks had been used in his store to make large purchases and Dixon told Deputy Kozisek he had contacted the Cody Police Department to make the report. Dixon stated an unknown female matching the description of **RULAND** from Sheridan and Gillette, had been in the Cody Walmart on January 28, 2014, at 6:00 am and purchased two HP Envy laptop computers each with a 2 year service plan. **RULAND** used a check to make the purchase in the amount of

\$1,589.84. **RULAND** returned to the Walmart store at approximately 7:41 am and returned both computers for a cash refund of \$1,589.84. The original check for the purchase was not kept by Walmart as it was entered into the system and returned to the female. **RULAND** stayed in the store and purchased a Canon camera, a camera lens and other items for a total of \$1,329.12 and paid for the items with a check. The check was entered into the system and returned to her. The system held a partial account number of 0152 and a check number of 0364. The true owner of the account is not known at this time.

11. **RULAND** was also observed in the Cody Walmart on January 9, 2014, at approximately 6:15 pm purchasing an HP Envy laptop computer and other items for a total of \$874.41 with a personal check. The check had a partial account number of 9448 and a check number of 6514. The check had an identification number of WY1011086171 on it. The female left the store in a light colored SUV. This transaction was paid for with a check belonging to J. D. from Buffalo, Wyoming. On December 28, 2013, J. D. wrote check #6514 to Charter in the amount of \$103.71 and mailed the check from inside of the Buffalo, Wyoming Post Office to pay his bill. J. D. told Deputy Kozisek that he noticed that his check had been cashed at the Cody Walmart after receiving a late notice from Charter.

12. **RULAND** was also in the Cody Walmart on January 10, 2014 to return a camera, a camera lens and an HP Envy laptop computer she had previously purchased. The clerk gave cash back to her in the amount of \$1,745.84. Video surveillance footage and receipts for the items were maintained by Dixon and provided to Cody Police Department.

13. On January 30, 2014, Dixon contacted the Cody Police Department (CPD) and stated that **RULAND** was in the store with a male attempting to return items she had previously purchased. CPD Officer Caudle responded to the Walmart store and took both into custody and waited for CPD Detective Jason Stafford.

14. Detective Stafford arrived at the Walmart store in Cody, Wyoming, and observed a white or silver four door SUV in the parking lot that matched the vehicle he had observed in surveillance video. The vehicle was identified as the vehicle **RULAND** and the male had arrived in at the store. Detective Stafford entered the Walmart and observed **RULAND** sitting on a bench and he stated he immediately recognized her from the surveillance video he had reviewed as the person who had passed the three checks at the store. Detective Stafford stated he approached **RULAND**, identified himself and asked her for her name and identification. Detective Stafford stated she told him her name was Stefani Ruland and provided a Montana driver's license as identification.

15. Detective Stafford stated he read **RULAND** her *Miranda* warnings and **RULAND** agreed to answer questions. Detective Stafford stated he wanted to talk to her about the Canon camera she was attempting to return to the store. **RULAND** stated she had purchased the camera and a camera lens from the store on January 28, 2014. Detective Stafford asked **RULAND** if she had purchased any other items on that day and **RULAND** stated she was in the store twice that day and she had purchased electronic items the first time she was in the store. Detective Stafford asked **RULAND** how she paid for the camera and camera lens she was trying to return. **RULAND** stated she either used her debit card or she wrote a check off of her account.

16. Detective Stafford stated he asked **RULAND** if she had been in the Cody Walmart on January 6, 9 or 10 of 2014. **RULAND** said no. Detective Stafford stated he asked **RULAND** if she had been in the Walmart stores in Gillette or Sheridan and **RULAND** said no. Detective Stafford stated he asked **RULAND** about the check she had used at Walmart on January 9, 2014, (the check belonging to J. D. of Buffalo). **RULAND** denied being in the store on that date. Detective Stafford told **RULAND** that the surveillance video from the store showed her in the store on January 9th and 10th and she had been driving the silver Subaru in the parking lot. **RULAND** stated she had been dropped off at the store from a pickup truck and she owned a 2009 Chevy Cobalt, not a Subaru. Detective Stafford stated he asked **RULAND** where she was getting the checks she was using in Cody, Sheridan and Gillette. Detective Stafford said **RULAND** paused for a long time and then said she only has her debit card and checking account. Detective Stafford asked **RULAND** who was providing her the checks. **RULAND** became quiet and did not answer any additional questions. Detective Stafford arrested **RULAND** for forgery based upon the information from Johnson County.

17. On January 31, 2014, Detective Stafford obtained a search warrant for the silver Subaru **RULAND** had driven to the Cody Walmart store. During the execution of the search warrant, Detective Stafford located the following: (1) a glue trap with a purple cord attached to it under the front driver's seat; (2) a bag containing 26 letters from the Casper, Wyoming area; (3) multiple pieces of mail that had been opened with checks missing from the envelopes; (4) at least three checks that had been washed to remove the ink; and (5) multiple items that had been purchased from various Walmart Stores. Detective Stafford also located the name, address, date of birth and social security number of another unknown person on a receipt in the vehicle. Between December

28, 2013, and January 30, 2014, **RULAND** obtained over \$1,000 in goods in service through the unauthorized use of other persons' identification. Walmart is a corporation with hundreds of outlets in the United States and whose business affects interstate commerce.

END OF AFFIDAVIT

PENALTY SUMMARY

DEFENDANT NAME: STEFANI COLLEEN RULAND

DATE: February 3, 2014

INTERPRETER NEEDED: _____ Yes ☒ No

THE GOVERNMENT, PURSUANT TO RULE 18, F.R.Cr.P., WITH DUE REGARD FOR THE CONVENIENCE OF THE DEFENDANT, ANY VICTIM AND WITNESSES, AND THE PROMPT ADMINISTRATION OF JUSTICE, REQUESTS TRIAL BE HELD IN:

_____ Cheyenne _____ Casper _____ Lander ☒ No Preference

VICTIM: ☒ Yes _____ No

SEAL CASE: _____ Yes ☒ No

OFFENSE: Ct. 1: 18 U.S.C. § 1708 (1st Paragraph)
(Theft of Mail)

PENALTIES: 0-5 Years Imprisonment
\$250,000 Fine
3 Years Supervised Release
\$100 Special Assessment

OFFENSE: Ct 2: 18 U.S.C. § 1028(a)(7) and (b)(1(D))
(Unlawful Use of a Means of Identification)

PENALTIES: 0-15 Years Imprisonment
\$250,000 Fine
3 Years Supervised Release
\$100 Special Assessment

Total: 0-20 Years Imprisonment
\$500,000 Fine
3 Years Supervised Release
\$200 Special Assessment

AGENT: Christopher J. Lucas **AUSA:** Lisa E. Leschuck

ESTIMATED TIME OF TRIAL: ☒ 1-5 days _____ more than 5 days

THE GOVERNMENT WILL SEEK DETENTION IN THIS CASE:

☒ Yes _____ No

The court should not grant bond because the Defendant is not bondable because there are detainers from other jurisdictions:

_____ Yes ☒ No